

From: "Blumer, Werner M." <WMB@cpuc.ca.gov>
To: "Skillman, Fred R" <FRS1@pge.com>, "Edan Prabhu" <edanprabhu@cox.net>, <chuck@csolt.net>
Date: Tue, Feb 14, 2006 12:05 PM
Subject: RE: Rule 21 Model Tariff, Section F.3 (NGOM)

Dear All;

I just cannot resist to point out again all that is wrong with this model:

"A" says "When NGOM is required", but then it is conditional to other means. "B" says "when NGOM is not required", but then it requires it under certain circumstances. "A" only speaks to "subsidized" generators, "B" only to "non-subsidized" generators, even though the tariffs apply to both equally and the options are the same. "A" refers to B.4 in addition to "tariffs", but "B" does not, even though B.4 also applies with regards to "approved tariffs, FERC (ISO requirements), rules, local, state and or federal regulations".

Why does "B" not say why the EC needs the output data in the same sentence. The sentence about estimating could be unrelated to the sentence about output data.

WHY ARE WE SEGREGATING INTO "REQUIRED" AND "NOT REQUIRED" WHEN THERE IS NO SUCH DISTINCTION FOR SUBSIDIZED VS. NON-SUBSIDIZED GENERATORS? And the text does not even bear out the titles. This raises unjustified expectations.

And I am still awaiting the utilities reference to the subsidized generators requiring NGOM for standby and non-bypassable and CRS charges. There is nothing in the tariffs about this.

Please consider this rant.

Thanks,

Werner

From: Skillman, Fred R [mailto:FRS1@pge.com]
Sent: Tuesday, February 14, 2006 10:59 AM
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Subject: Rule 21 Model Tariff, Section F.3 (NGOM)

Good Morning Edan & Chuck:

PG&E supports the Rule 21 Working Group's proposal regarding Section F.3 (NGOM) of the Model Rule 21 tariff. I have attached a copy of the version we plan to file, notwithstanding new developments that may arise during our conference call tomorrow.

Have a great day,

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<<WG response_Rule 21_Section F3_final.doc>>

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